FILED 9 APR *13 14:33USDC-ORP

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

| UNITED STATES OF AMERICA, |) | |
|---------------------------|---|---------------------------|
| |) | Case No. 3:13-CR-00064-HZ |
| Plaintiff, |) | |
| |) | SUPERSEDING |
| v. |) | INFORMATION |
| |) | |
| CYRUS ANDREW SULLIVAN, |) | [18 U.S.C. § 875(c)] |
| |) | |
| Defendant. |) | |

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1 [MAKING A THREATENING COMMUNICATION]

On or about June 4, 2012, in the District of Oregon, defendant Cyrus Andrew Sullivan knowingly transmitted and caused to be transmitted in interstate or foreign commerce a communication containing a threat to injure the person of another, to wit, an email communication via the Internet containing a threat to kill another person, A.K., which a reasonable person would take as a serious expression of an intention to inflict bodily harm upon A.K. All in violation of Title 18, United States Code, Section 875(c).

Dated this 2⁴² day of April, 2013.

S. AMANDA MARSHALL United States Attorney

SEAN B. HOAR

Assistant United States Attorney